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February 8, 2019

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-3398

Attn: Filing Center

RE: UM 1968—PacifiCorp's Motion

PacifiCorp d/b/a Pacific Power encloses for filing its unopposed Motion to Hold Proceeding in Abeyance in the above-referenced docket.

Please direct any informal questions regarding this filing to Natasha Siores at (503) 813-6583.

Sincerely,

Etta Lockey
Vice President, Regulation

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1968**

In the Matter of
PACIFICORP d/b/a PACIFIC POWER,
Application for Authority to Implement
Revised Depreciation Schedule

**PACIFICORP'S
MOTION TO HOLD PROCEEDING IN
ABEYANCE**

In compliance with OAR 860-001-0420, PacifiCorp d/b/a Pacific Power requests that the Public Utility Commission of Oregon (Commission) hold the above-captioned proceeding in abeyance and suspend the current procedural schedule outlined in the November 6, 2018 Prehearing Conference Memorandum issued by Administrative Law Judge Sarah Rowe. PacifiCorp has discussed this motion with all parties to this docket. Staff and the Oregon Citizens' Utility Board (CUB) support the motion, and the Alliance of Western Energy Consumers (AWEC) does not oppose the motion.

PacifiCorp filed its Application for Authority to Implement Revised Depreciation Rates on September 13, 2018. CUB filed its notice of intervention on September 19, 2018. AWEC filed its petition to intervene on October 9, 2018. A prehearing conference was held on October 29, 2018, where the parties proposed a procedural schedule. Administrative Law Judge Rowe issued the prehearing conference memorandum establishing the current procedural schedule on November 6, 2018.

On December 3-4, 2018, PacifiCorp presented preliminary studies regarding the economic lives of its current coal plants in its 2019 Integrated Resource Plan (IRP) stakeholder meeting. These studies provided more comprehensive information following the

Commission's directive in docket LC 67 that PacifiCorp provide an economic analysis of its coal units.

On January 28, 2019, PacifiCorp filed notice in docket LC 70 that it is developing an economic analysis of its coal units that will inform the subsequent portfolio-development phase of its 2019 IRP, including an assessment of regional haze compliance alternatives and a broad range of sensitivity studies. In order to complete the necessary analysis, additional time is required to prepare the 2019 IRP and PacifiCorp will file its 2019 IRP no later than August 1, 2019. PacifiCorp expects to complete the coal unit analysis by June 2019.


PacifiCorp's depreciation schedules may be affected by the IRP analysis. Cost causation principles are generally supported by depreciable lives commensurate with the useful life of the resource. Accordingly, the updated coal analysis may impact the depreciation study.

PacifiCorp's requested effective date for its new depreciation schedules will not be affected by holding the proceeding in abeyance. PacifiCorp has requested that the new depreciation schedules go into effect on January 1, 2021. There is adequate time to allow for the completion of the IRP coal unit analysis and subsequent review by the parties' of PacifiCorp's proposed depreciation schedules if amended to address issues identified through the IRP process. Further, PacifiCorp will continue to cooperate in planning site visits and responding to discovery while the proceeding is held in abeyance.

I. CONCLUSION

For the reasons set forth above, PacifiCorp requests that this docket be held in abeyance at least until PacifiCorp completes its coal unit analysis.

Respectfully submitted February 8, 2019.

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